

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

Docket No. 03-50

Respondent: Louis Agro
Title: Director - Metrics Policy & Planning

REQUEST: Department of Telecommunications and Energy, Set #1

DATED: January 12, 2006

ITEM: DTE 1-1 Verizon states that “Verizon’s metrics process and Carrier-to Carrier (“C2C”) metrics guidelines are ubiquitous throughout the former Bell Atlantic footprint and, with the exception of New Jersey; Verizon’s PAP plans are substantially similar.” Verizon MA’s November 8, 2005 letter from Bruce P. Beausejour to Secretary Cottrell, page 2. Are the differences in the plans, including the New Jersey plan, material, such that those differences would render ineffective any reliance by the Department on future audits of those plans for purposes of ensuring Verizon’s compliance with its Massachusetts Performance Assurance Plan (“PAP”) obligations? Please explain.

REPLY: No. With the exception of the New Jersey PAP, the differences in the plans in the other 12 jurisdictions in the former Bell Atlantic footprint¹ are immaterial, such that those differences would not render ineffective any reliance by the Department on future audits of those plans for the purposes of ensuring Verizon’s compliance with its Massachusetts Performance Assurance Plan obligations. Excluding the New Jersey PAP, the similarities between the PAPs include, but are not limited to the following:

- ❑ The underlying metric definitions for all of the metrics in each of the PAPs are specified in the C2C guidelines (which are common to all of the states in the former Bell Atlantic footprint.)
- ❑ Each of the metrics included in the Massachusetts Performance Assurance Plan are included in each of the 12 other plans.

¹ The jurisdictions are: Connecticut, Delaware, the District of Columbia, Delaware, Maine, Maryland, New Hampshire, New York, Pennsylvania, Vermont, Virginia, and West Virginia. The plan in New Jersey is materially different from the MA PAP, and Verizon has not suggested that it would serve as a basis for ensuring compliance in Massachusetts.

- ❑ Each of the PAPs includes a structure consisting of Mode of Entry, Critical Measures, Special Provisions and Change Control Assurance Plan.
- ❑ Each of the PAPs contain the same performance standards for corresponding metrics in the plan and corresponding sections of the plans.
- ❑ Each of the PAPs utilize the same scoring mechanism of 0, -1 and -2 for both Mode of Entry and Critical Measures.
- ❑ Each of the PAPs contain five Modes of Entry - UNE Platform, UNE Loop, Resale, DSL, and Interconnection Trunks
- ❑ Each of the PAPs contain seven categories in Critical Measures - UNE Platform, UNE Loop, Resale, DSL, Interconnection Trunks, Network Performance, Resolution Timeliness, and Other.
- ❑ Each of the PAPs contain provisions for evaluating both state-wide Aggregate performance (the “Aggregate Rule”) and Individual CLEC performance (the “Individual Rule”) for Critical Measures.
- ❑ Each of the PAPs are produced by the common systems that utilize common data sources, file layouts, etc.

Of course, each state PAP allocates different dollar penalty amounts to each metric but such differences are solely a function of the size of the market in each state. Other than the state-specific allocations of penalty amounts and a few minor state-specific nuances the plans are identical.

Although New Jersey uses the same performance measures and standards, its plan has an entirely different structure.

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

Docket No. 03-50

Respondent: Louis Agro
Title: Director - Metrics Policy and Planning

REQUEST: Department of Telecommunications and Energy, Set #1

DATED: January 12, 2006

ITEM: DTE 1-2 Excluding the successful results of Verizon's two previous audits of the Massachusetts PAP, please explain in detail the basis upon which the Department can be confident of Verizon's continued compliance with its Massachusetts PAP obligations during years that an audit is not conducted in Massachusetts. Please explain in detail how the successful results of future audits of PAPs in the Verizon East footprint (or other Verizon states) and/or future FCC audits would serve as a reliable proxy for demonstrating continued compliance with Verizon's Massachusetts PAP obligations ("proxy states"), for those years when the Department does not conduct an audit. Are the systems and processes governing PAP compliance in Massachusetts the same as the systems and processes in proxy states? Does Verizon automatically institute modifications resulting from an audit in one state to the PAP compliance processes of similarly situated states?

REPLY: The Department can be confident that the successful results of future audits of PAPs in the Verizon East footprint will demonstrate continued compliance with Verizon MA's PAP obligations for those years when the Department does not conduct an audit because the systems and processes ensuring PAP compliance in Massachusetts are the same as the systems and processes in other Verizon East states. The systems and process by which the monthly reports are produced are common. The systems consist of common data sources and file layouts to produce common report formats. Additionally, when modifications are required, Verizon automatically makes modifications resulting from an audit in one state to the PAP compliance processes of similarly situated states (excludes New Jersey) to maintain uniformity across the 13 jurisdictions of the former Bell Atlantic footprint, including Massachusetts. These modifications are implemented

REPLY cont.

-2-

through Verizon's Metrics Change Control process, which provides documentation and notification of the modifications.

VZ #2

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

Docket No. 03-50

Respondent: Beth Abesamis
Title: Director – Wholesale Audit
Process Assurance

REQUEST: Department of Telecommunications and Energy, Set #1

DATED: January 12, 2006

ITEM: DTE 1-3 If the Department were to modify the audit requirement by expanding the time in between audits but selecting a sample time period from each year covered by the audit, what would be the impact on Verizon from both an administrative and cost standpoint?

REPLY: If the Department modified the annual audit requirement but still selected time periods to sample, the administration of this sample and cost to Verizon for the audit would actually increase both in time and expense.

The reason this would occur is that Verizon would potentially be auditing sample metrics from prior year(s) that might have been modified and or eliminated. In addition, Verizon keeps readily available metric details for 13 months. The older data is archived and retained according to the Company's data retention guidelines. If this data needed to be utilized, system infrastructure considerations would need to be addressed prior to restoring the data. The retrieval of the archived data would create an additional administrative burden for Verizon and would cause Verizon to incur additional costs.

If Verizon needed to retrieve data, or keep data from being properly archived (waiting to see which months may be needed for an audit review), this would take away from the successful audit process that Verizon now has in place.

As Verizon has stated in response to MA DTE 1-2, any changes made for other states that impacted Massachusetts would also be made for Massachusetts. Notices of any such changes are available to requesting parties. The DTE can feel confident that the results from

REPLY cont.

-2-

other Verizon East audits can be relied upon to demonstrate continued compliance with Verizon MA's PAP obligations, during years when a Massachusetts-specific audit is not conducted.

VZ #3